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L. LIN WOOD, P.C.
TRIAL LAWYERS

L. LIN WOOD
Direct Dial: (404) 891-1406
lwood@linwoodlaw.com

July 2, 2018

VIA FEDEX & ELECTRONIC MAIL

Ms. Joy Reid
30 Rockefeller Plaza
New York, NY 10112

Re: *Defamation of Mrs. Roslyn La Liberte*

Dear Ms. Reid:

This Firm has been retained by Mrs. Roslyn La Liberte to pursue legal redress for your cyberbullying and false, defamatory, and malicious accusations against her. Between June 29 and July 1, 2018, you published to the world, your 1.24 million Twitter followers, your 206,430 Facebook followers, and your 96,600 Instagram followers – with zero fact checking – that Mrs. La Liberte is a bigoted racist. You are indisputably wrong and published your false claim with actual and constitutional malice. To afford you an opportunity to mitigate the substantial harm you have caused to Mrs. La Liberte, I hereby demand on her behalf that you immediately retract your Twitter, Facebook, and Instagram post(s), and simultaneously apologize to Mrs. La Liberte.

On June 29, 2018, you retweeted Mr. Alan Vargas's tweet as follows: "'You are going to be the first deported' 'dirty Mexican' [w]ere some of the things they yelled at this 14 year old boy. He was defending immigrants at a rally and was shouted down. Spread this far and wide this woman needs to be put on blast." A copy of your retweet is attached hereto as Exhibit A.

On June 29, 2018, you published via Instagram as follows: "He showed up to a rally to defend immigrants. . . . She showed up too, in her MAGA hat, and screamed, 'You are going to be the first deported' . . . 'dirty Mexican!' He is 14 years old. She is an adult. Make the picture black and white and it could be the 1950s and the desegregation of a school. Hate is real, y'all. It hasn't even really gone away." A copy of your Instagram post is attached hereto as Exhibit B.

On or around July 1, 2018, you further published via Facebook and Instagram as follows: "It was inevitable that this image would be made. It's also easy to look at old black and white photos and think: I can't believe that person screaming at a child, with their face twisted in rage, is real. B[ut] every one of them were. History sometimes repeats. And it is full of rage. Hat tip to @joseiswriting. #regram #history #chooselove." Your Facebook and Instagram posts are attached hereto as Exhibit C.

As you must have been aware prior to July 1 and knowingly or recklessly disregarded prior to June 29, the young man depicted in your various photos confirmed on or before June 29 that you were wrong when you claimed that Mrs. La Liberte "screamed [y]ou are going to be the first deported" . . . 'dirty Mexican!'" See <http://www.foxla.com/news/local-news/people-online-twist->

Ms. Joy Reid
July 2, 2018
Page 2 of 3

the-real-story-behind-photo-of-woman-yelling-at-boy (posted June 29, 2018). Your false claims have incited a social media mob to, as you retweeted, “blast” Mrs. La Liberte. She has received countless hate messages and phone calls, including death threats. Unknown individuals are driving by her home. Her business is being boycotted, and she has already lost substantial business. She anticipates having to resign from her position. The personal impact to Mrs. La Liberte has been extreme, but for privacy reasons that impact will not be described in this letter. Her reputation has been shattered.

As demonstrated by the Fox news report, the truth was readily available to you. Yet, despite having the megaphone of a national political pundit, you made no attempt to confirm your accusation to be true despite the on-its-face severity of your claim. Your actions represent nothing more than the hatemongering to advance a political agenda that you profess to detest. In today’s political climate, you knew and intended that your accusation would destroy the once private world of Mrs. La Liberte. Representative examples of the consequences of your actions are attached hereto as Exhibit D.

You lacked any basis whatsoever for your false accusations. Your sole source was apparently a seventeen-year-old social media activist who professed no firsthand knowledge and who has a demonstrable political bias. It is readily apparent that you republished his claim on multiple occasions without even attempting to verify the defamatory accusation. Worse – and while you will be held liable for both your original publication and republication – your posts are materially different from Mr. Vargas’s. His tweet did not put these heinous words in Mrs. La Liberte’s mouth; only yours did. Even after it was public knowledge that Mrs. La Liberte did none of the things you accuse her of, you posted the July 1 Instagram and Facebook post. Your constitutional malice against Mrs. La Liberte is conclusively established by your long running campaign against President Trump and all of his supporters. Your actual malice is conclusively established by the incredible recklessness with which you published your accusations on June 29 and your knowledge of falsity on July 1. Indeed, even the comments on your own posts demonstrate your knowledge of falsity.

You may vainly defend your misconduct on the basis that, as a reporter, your conduct is protected by the First Amendment. But it isn’t, and in your own recent words, you “should have known better” and your conduct has made it very difficult for Mrs. La Liberte to “walk around in this world.” It is Mrs. La Liberte’s entirely civil conduct that is protected by the First Amendment. She merely appeared at a public forum to participate in a process that formed the backbone of this country: democracy. No legal citation is necessary to confirm that you had no privilege to report on this matter. Though this was a public proceeding, you did not attempt to report on the proceeding nor did you review or cite to such a proceeding. You simply made up out of whole cloth that Mrs. La Liberte is the face of all things terrible in this country.

Your accusations are defamatory *per se*, and while Mrs. La Liberte has already incurred substantial special damages, damages to her reputation due to millions of Americans who have seen your tweet and trusted it to be credible will be presumed as a matter of law. You are liable for each and every republication of your false accusations.

Ms. Joy Reid
July 2, 2018
Page 3 of 3

Accordingly, I reiterate Mrs. La Liberte's demand that you immediately: (1) take down all publicly available copies of the social media posts identified herein and any other posts regarding Mrs. La Liberte; (2) publish a full and fair retraction in as conspicuous a manner as you originally published the false and defamatory Article; and (3) issue a written, public apology to Mrs. La Liberte. You have until 6:00 p.m. EDT today to do so of your own accord. Afterwards, Mrs. La Liberte will have no choice but to issue her own statement regarding your misconduct. Provide to me a copy of your retraction and apology upon issuance.

Finally, this letter also serves as notice to you and each of your affiliated entities, employees, agents, assignees, and other persons acting on your behalf (collectively, "you") to preserve any and all evidence related in any way to your social media posts and any other accusations that you have published regarding Mrs. La Liberte. By this letter, you are hereby directed not to destroy, conceal, or alter any paper or electronic files, physical evidence, and/or other data relating in any way, no matter how remote, to the social media posts or other accusations you have published against Mrs. La Liberte and/or the circumstances leading to their dissemination, including, but not limited to: (1) all communications between you and any third party in any way related to the social media posts; (2) all sources for the social media posts or other accusations you have published against Mrs. La Liberte; (3) any and all documents and data referring to, reflecting, or relating to communications between you and any such third-parties and/or sources; and (4) any and all documents and data referring to, reflecting, or relating to internal MSNBC communications regarding the social media posts or other accusations you have published against Mrs. La Liberte.

I understand that many records and files are maintained electronically. However, this letter specifically requests that all paper and hard copy originals be maintained and preserved in their original format. By the same token, electronic documents and the storage media on which they reside may contain relevant, discoverable information beyond that which may be found in printed documents. Therefore, even where a paper copy exists and has been preserved, please preserve and maintain all electronically stored documents in their original native format, including all metadata. This preservation demand specifically encompasses any and all electronic documents, including but not limited to, all word-processed files, e-mails, spreadsheets, all databases, and any other electronically stored and/or generated documents or files.

Govern yourself accordingly.

Sincerely,



Lin Wood

cc: Mrs. Rosalyn La Liberte

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Hillary Clinton on Trump's child-detention policy: 'It keeps me up at..
She has made peace with losing the election – but not with Donald Trump.
And now she is fighting to undo the damage of the president's most revile...
theguardian.com

502 9.5K 32K

Joy Reid Retweeted



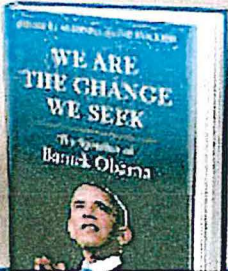
Alan Vargas @TheAlanvargas · Jun 28
" You are going to be the first deported"
" dirty Mexican "

Were some of the things they yelled they yelled at this 14 year old boy. He was defending immigrants at a rally and was shouted down.

Spread this far and wide this woman needs to be put on blast.



WE ARE
THE CHANGE
WE SEEK
The Speeches of
Barack Obama



@JoyAnnReid

Tweets 141K Following 5,127 Followers 1.24M Likes 15.6K Lists 2

Follow

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joyannreid • [Follow](#)

joyannreid He showed up to a rally to defend immigrants. ... She showed up too, in her MAGA hat, and screamed, "You are going to be the first deported" ... "dirty Mexican!" He is 14 years old. She is an adult. Make the picture black and white and it could be the 1950s and the desegregation of a school. Hate is real, y'all. It hasn't even really gone away.

[Load more comments](#)

bmt096 She and people like her are vile, ▼

14,765 likes

2 DAYS AGO

[Log in to like or comment.](#)

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7/2/2018

Joy Reid - Home



Joy Reid

Like This Page · 14 hr

It was inevitable that this in
also easy to look at old bla
think: I can't believe that pe
child, with their face twistec
one of them were. History s
is full of rage. Hat tip to @j
#history #chooselove

Like

Com

2.2K

1,700 Shares



Penny M. Stein Joy f
posting the "2018" im
reflect the truth. I saw
young man who said
and that they were tal
Fact check and corre

Like · Reply · 14h

View previous repl



Phyllis McDon
very civil to me.

Like · Reply · 14h

View more replies



Phelisa Smith-Pittm
running around in a Iv
a heated, "civil", "disc
teenager is somehow
Really? Lady, get real
everything we need to
being a "nice" grandn
though!

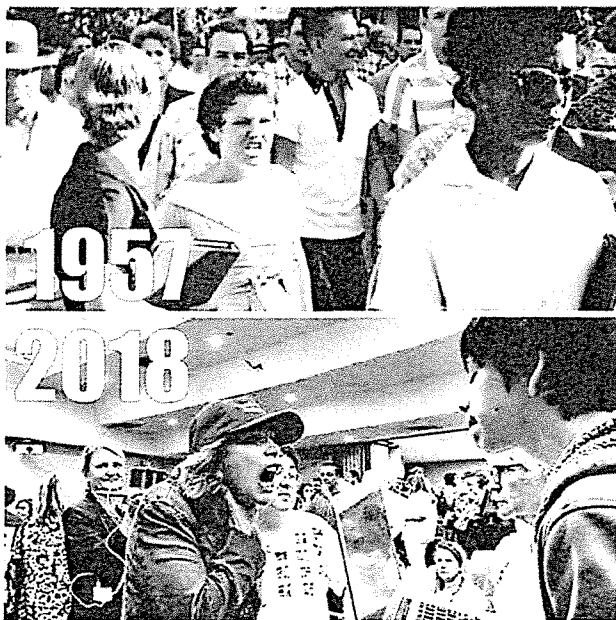
Like · Reply · 5h



Write a comment...

7/2/2018

Joy-Ann Reid (@joyannreid) • Instagram photos and videos



joyannreid • Follow

joyannreid It was inevitable that this image would be made. It's also easy to look at old black and white photos and think: I can't believe that person screaming at a child, with their face twisted in rage, is real. By every one of them were. History sometimes repeats. And it is full of rage. Hat tip to @joseiswriting. #regam #history #chooselove

Load more comments

canadiannurseratchet As a WW I can never ▾

6,575 likes

14 HOURS AGO

Log in to like or comment.

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7/2/2018

#RoslynLaLiberte hashtag on Twitter

Home Moments

#RoslynLaLiberte



Have an account? Log in

#RoslynLaLiberte

Top Latest People Photos Videos News Broadcasts

Search filters · Show

New to Twitter?

Sign up now to get your own personalized timeline!

Sign up

Worldwide trends

#BRAMEX

276K Tweets

VAI BRASIL

223K Tweets

#MondayMotivation

122K Tweets

#BolaoAquiDoTwitter

9,545 Tweets

#Wimbledon

60.7K Tweets

#ارتفاع_اسعار_الالبان

43.2K Tweets

Gilas

59.5K Tweets

Rafa Marquez

12.6K Tweets

歌丸師匠

329K Tweets

Michael Cohen

40.4K Tweets

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M* @MattyBrand · Jul 1

A racist piece of trash #RoslynLaLiberte yells at a 14 year old that he's a "dirty Mexican" while this troll @GenevievePeters stands by & films it all. More proof that Trump supporters are disgusting people. 🤢🤢



18 55 85



Brad Paquin @BradPaquin1 · Jun 29

#RoslynLaLiberte is in the process of discovering just how little tolerance Twitter has for angry, racist white people who yell hateful crap at a 14 year old.

There are some things about Twitter that I absolutely love.

You are going to be the first deported
"dirty Mexican"

Were some of the things they yelled they yelled at this 14 year old boy. He was defending immigrants at a rally and was shouted down.

Spread this far and wide this woman needs to be put on blast.



25 246 456



Trumpster Fire @ccriley3 · Jun 29

Replying to @TheAlanvargas

Call R. C. Design Construction Associates, Inc. at 818.346.5480. Woodland Hills Architect and let them know how you feel about Roslyn La Liberte's hideous racist abuse toward this child. #RoslynLaLiberte #RacistRoslyn



2017 WO man · 2017 TruthLover · 8P

Replying to @TheAlanvargas and 1

This horrible woman is Roslyn La 14 yr old boy at a Simi Valley City there to talk about immigration & MAGA zealot racist runs RC Design Woodland Hills. BOYCOTT RC DEE

replies: 1 star on yelp. She did this to hers

no sympathy. Just gonna sip my te

1 star on yelp. She did this to hers

no sympathy. Just gonna sip my te

1 star on yelp. She did this to hers

no sympathy. Just gonna sip my te

509

Retweet Limit Exceeded

7/2/2018

#RoslynLaLiberte hashtag on Twitter

✓ 25 ↓ 145 ↻ 255



(((Emily Weisberg))) @EmilyWeisberg · Jun 28

Top: Hazel Massery screams at Elizabeth Eckford, of the #LittleRockNine. as Eckford and 8 other brave young men and women, desegregate Little Rock High. 1957.

Bottom: #RoslynLaLiberte screams at a 14 yr old boy at a #SimiValley meeting re #SB54. 2018. But please, #remain civil.



12 241 325

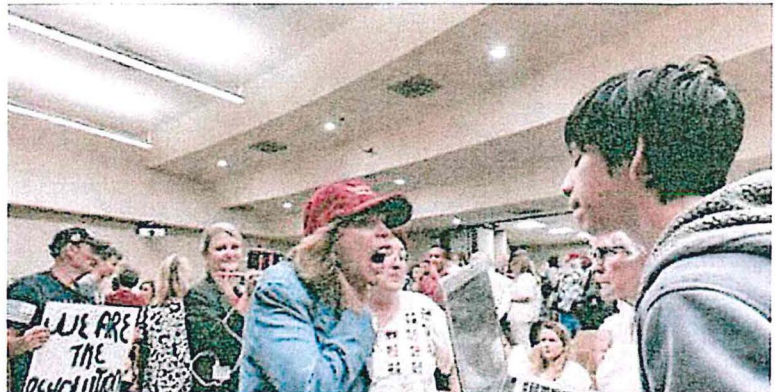


Eric Skodis @Ickysan · Jun 29

#RoslynLaLiberte Roslyn La Liberte is a Trumpkin living among us liberal elites in L.A.. Please call her & let her know how you feel about her brand of racism. (818) 974-3516 (H) (818) 731-2829 (W) 🇺🇸

This horrible woman is Roslyn La Liberte. She yelled at this 14 year old boy at our Simi Valley City Council Meeting who was there to talk about immigration and supporting SB54. This MAGA zealot and racist runs RC Design Construction in Woodland Hills. BOYCOTT RC DESIGN
<http://www.rcassociatesinc.com/#!about-us> PLEASE SHARE

#simiValley city council voted 4-0 to side with Jeff Sessions against #sb54. More actions to come.



7/2/2018

#RoslynLaLiberte hashtag on Twitter



8 86 120



Tony Aaron II @TonyAaronII · Jun 29

Here's an excerpt from my 18 minute interview with #GenevievePeters, the woman recording #RoslynLaLiberte in the viral photo:

"We're done, we're done with being silent at these types of things." "People that want our country back. And people that are taking our country back."

23 59 77

[Show this thread](#)

Tony Aaron II @TonyAaronII · Jun 29

I have completed my 1 hour interview with #RoslynLaLiberte. @CBSNews has already reached out to me about the recordings of the interview. I would also like to get in touch with @MSNBC if at all possible.

6 26 94

[Show this thread](#)

AndreaDB @AndreaDB50 · Jun 30

Replying to @nadinevdVelde

While @GenevievePeters smirks and films in the background. She deserves as much public shaming as #RoslynLaLiberte for playing along while someone verbally abused a child.

7 82 189



Anita Timeout! @AnitaTimeOut · Jun 29

Roslyn La Liberte is a MAGAT!!! Twitter - do your thing!

#racist #RoslynLaLiberte #resist #fbr #resistance #bluewave #BlueWave2018

MAGAT* Du Jour...Twitter do your thing!

Roslyn La Liberte yelled "You are going to be the first deported" & "dirty Mexican" at this 14 yr old boy (left) who was at the Simi Valley City Council mtg to talk about immigration/supporting SB54. La Liberte's a repeat offender (right) and likes to pick on young people.

Roslyn La Liberte ~ FC Design Construction ~ roslyn@fcassociatesinc.com ~ Phone: (818) 356-5480 | (818) 731-2829 ~ Fax: (818) 346-5855

*MAGAT = Bottom-feeding scum that thrives on the racist rhetoric of the rotting sack of human excrement in the White House. See also: republican, "Conservative", White Nationalist, Neo-Nazi, Evangelical Christian.

7/2/2018

#RoslynLaLiberte hashtag on Twitter



20 177 208

Jane Nibful @Nibful · Jun 30

Nibful

Important info regarding the #RoslynLaLiberte photo!



luv2teachss @raluevanos

The woman with the selfie stick I am trying to block from shoving a camera in my minor son's face at the Simi Valley City Council Meeting this week is Genevieve Peters who is NOT from Simi Valley and booed and screamed...

20 30



Mo Fei Chen @DynaMoChen · Jun 29

Replying to @mytwocents805 @ShaunKing
Peak irony when your name is La Liberte.

#RoslynLaLiberte

6 18 174



Tony Aaron II @TonyAaronII · Jun 29

Here's excerpt #1 from the beginning of my 1 hour interview with #RoslynLaLiberte. "I have my own views", she says. I ask how that squares with "Mexicans are rapists and criminals." She replies, "Everything gets taken out of context." The interview goes many places from there...

39 85 127

[Show this thread](#)



CanerdianGirl @CanerdianGirl · Jun 29

Replying to @TonyAaronII

"Out of context" is my favorite excuse for "completely unacceptable behavior". Screaming at children #GTFO #RoslynLaLiberte

39 85 127

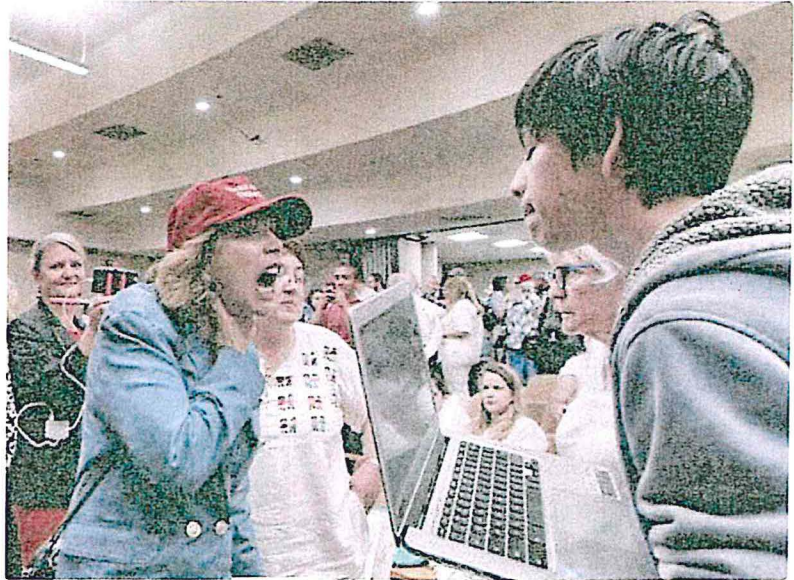
7/2/2018

#RoslynLaLiberte hashtag on Twitter

1 33 149

**Beans Oregano** @RayAgua1031 · Jun 29

#RoslynLaLiberte The face you make when you gag on your own #racism And #hate.



19 80 224

**Tony Aaron II** @TonyAaronII · Jun 29

I'm on the phone interviewing #RoslynLaLiberte right now. I will be posting the recording of the phone call and a write about it soon.

**Alan Vargas** @TheAlanvargas" You are going to be the first deported"
" dirty Mexican "

Were some of the things they yelled they yelled at this...

19 101 189

[Show this thread](#)**William Bradish** @sir_wmb · Jun 29

This disgusting individual is Roslyn la liberte. She likes to verbally assault children. Let's make her famous for it. #RoslynLaLiberte #Resist

**Yes, the proud Xennial, Holly** @imthatholly

Replying to @TheAlanvargas

She wants to be famous, ppl. They all do. @ me if you want a cleaner caption but they piss be off. Also, I just took the above photo and used free phrase.it on the web. And props to @2017TruthLove for the info.

3 38 54

**Jax Progressives** #OurRevolution @JaxProgressives · Jun 30

Replying to @BradPaquin1 @jojake111

This witch is proud. She used pic on Google business page.

#BoycottRCAssociates #BoycottRCAssociates #BoycottRCAssociates
#BoycottRCAssociates #BoycottRCAssociates #BoycottRCAssociates
#BoycottRCAssociates #BoycottRCAssociates #BoycottRCAssociates

7/2/2018

#RoslynLaLiberte hashtag on Twitter

#RoslynLaLiberte



R C Associates

1.0 ★★★★★ (3)

Construction company in Los Angeles, California

OVERVIEW

REVIEWS

PHOTOS



CALL



DIRECTIONS



SAVE



WEBSITE

view

1

22

33

**Peta Rogers** @PrinPeta · Jun 29

Replying to @TheAlanvargas

Oh Alan sweetie, believe me #RoslynLaLiberte has gone viral as #RabidTrumpster. So has the lovely lady @GenevievePeters standing behind her. Some friends of mine identified them both. Believe me you've got a LOT of support out there.

4

49

121

**Gibson-Herrell** @GibsonHerrell · Jun 30

As a mother, a decent human being, and a registered Republican since 1991, the actions of #RoslynLaLiberte and @GenevievePeters disgust me. If this is truly what the party has become (and it seems that is the case) it's time for me to #walkaway. #racists #goddontlikeugly

**Alan Vargas** @TheAlanvargas

" You are going to be the first deported"
" dirty Mexican "

Were some of the things they yelled they yelled at this...

3

40

71

**MaryAnn**

@favoriteantssi · 22m

Somebody should tape all this harassment. We will need it for law suits.

Nancy Sinatra, Debra Messing, Toure, Soledad O'Brien Among Twitter Lynch Mob Targeting Trump Supporter #RoslynLaLiberte Over Viral Photo Hoax With Latino Boy thegatewaypundit.com/2018/07/nancy-... via @gatewaypundit

7/2/2018

#RoslynLaLiberte hashtag on Twitter

Nancy Sinatra, Debra Messing, Toure, Soledad O'Brien, David Hogg ...

Blue Check Mark Twitter celebrities including Nancy Sinatra, Debra Messing, Rosanna Arquette, Toure, David Hogg and Soledad O'Brien followed Joy ...

thegatewaypundit.com



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7/2/2018

Trumpster Fire on Twitter: "Call R. C. Design Construction Associates, Inc. at 818.346.5480. Woodland Hills Architect and let them know ...

**Alan Vargas** @TheAlanvargas · Jun 28

" You are going to be the first deported"
" dirty Mexican "

Were some of the things they yelled they yelled at this 14 year old boy. He was defending immigrants at a rally and was shouted down.

Spread this far and wide this woman needs to be put on blast.



5.2K



71K

77K

**Trumpster Fire**

@ccriley3

[Follow](#)

Replying to @TheAlanvargas

Call R. C. Design Construction Associates, Inc .
at 818.346.5480. Woodland Hills Architect and
let them know how you feel about Roslyn La
Liberte's hideous racist abuse toward this
child. [#RoslynLaLiberte](#) [#RacistRoslyn](#)

5:40 AM - 29 Jun 2018

7/2/2018

Alan Vargas on Twitter: "Well this happened...."

**Alan Vargas**
@TheAlanvargas

Follow



Well this happened.

**Alan Vargas** @TheAlanvargas · 17h

" You are going to be the first deported"
" dirty Mexican "

Were some of the things they yelled they yelled at this 14 year old boy. He was defending immigrants at a rally and was shouted down.

Spread this far and wide this woman needs to be put on blast.



2:55 PM - 29 Jun 2018

46 Retweets 104 Likes



37

46

104

**Vinnie Chieco** @vinniechieco · Jul 1

Replying to @TheAlanvargas



There seems to be some mistake here. According to the woman AND the boy in

https://twitter.com/TheAlanvargas/status/1012816835895390208/photo/1?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwtterm%5E1012816... 1/1